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Change Number <b>M-44-93-01</b>	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date <b>Jan. 25, 1994</b>
Originator <b>Megan Lerchen</b>		Phone <b>206-407-7145</b>
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title <b>Double- and Single-Shell Tank Characterization</b>		
Description/Justification of Change These milestones are an augmented replacement for M-10-00 et seq. and allow for a more tailored approach to characterizing waste in individual DSTs and SSTs. Also included are improvements to the data management and reporting system needs. Specific aspects of this milestone are as follows: <ul style="list-style-type: none"> <li>• Characterization of DSTs and SSTs is covered.</li> <li>• Characterization of DST and SST waste phases (solids, liquids, gases) is covered as specified through the Data Quality Objective (DQO) process.</li> <li>• Characterization is designed to support retrieval of all tank waste. Because all waste is to be retrieved and treated prior to disposal, it is recognized that additional characterization information will be obtained as necessary during subsequent processing and treatment phases. This "down-stream" characterization is outside the scope of the milestone described here unless the waste processing or treatment occurs within the DSTs and/or SSTs.</li> <li>• A Tank Waste Analysis Plan (TWAP) will be developed using the results of a DQO process for characterization of all tanks. The TWAP establishes the framework and</li> </ul>		
(Continued on following page)		
Impact of Change Replaces M-10-00 et seq. Characterization of DSTs is added. Requirement for offsite access to electronic database(s) containing tank characterization information is added. Requirement for taking two core samples of each SST is removed. Submittal of characterization plans for each DST and SST is added. Submittal of Tank Characterization Reports is added.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix D (Table D-1 and Figure D-1 Work Schedule). Waste Characterization Plan for the Hanford Site Single-Shell Tanks, WHC-EP-0210. Integrated Sampling and Analysis Plan for Samples Measuring > 10 mrem/hour, WHC-EP-0533. Additional reports and submittals required by this change.		
Approvals <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved This change form approved by Amendment Four to the Hanford Federal Facility Agreement and Consent Order executed by the signatories on January 25, 1994.		
<u>John Wagoner</u> DOE	<u>January 25, 1994</u> Date	<div style="border: 2px solid black; padding: 10px; text-align: center;"> <h1 style="margin: 0;">RECEIVED</h1> <p style="margin: 5px 0;">MAR 17 2003</p> <p style="margin: 5px 0; font-size: 1.5em;">EDMC</p> </div>
<u>Gerald Emison</u> EPA	<u>January 25, 1994</u> Date	
<u>Mary Riveland</u> Ecology	<u>January 25, 1994</u> Date	

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Description/Justification of Change (continued from previous page):

process for conducting the characterization of all tank wastes. The scope of the TWAP will cover all aspects of tank waste analysis which are generic to multiple DSTs and SSTs. A Tank Characterization Plan (TCP) will also be developed for each DST and SST using the DQO process. The TCPs will integrate the results of the various issue- and process-based DQO efforts into a specific sampling and analysis plan for a given tank. Development of TCPs through the DQO process is intended to allow users (e.g., Hanford Facility user groups, regulators) to ensure their needs will be met and that resources are devoted to gaining only necessary information.

- The extent of tank sampling and analysis will be flexible and dependent on individual tank attributes. Because data obtained prior to 1989 did not have quality assurance and quality control assured under the TPA, acceptable characterization data will be based on some sampling and analysis of each waste phase for each DST and SST as specified through the DQO process. The existing TPA M-10-00 milestone (Complete analyses of at least two complete core samples from each single-shell tank) did not allow flexibility in the application of characterization resources on a particular tank within a recognized group. For example, if the process history for a three-tank cascade indicates that their contents should be essentially the same, under this milestone one tank may be more extensively characterized, the middle tank may have confirmatory sampling and analysis, and the third tank by one core sample. Thus, although not all of the tanks will have two core samples taken, it is expected that the tank contents will be better understood by applying essentially the same resources (as were planned under M-10-00) unevenly to a group of tanks.
- A Tank Characterization Report (TCR) will be issued for each DST and SST as specified by the TWAP and TCP. If a TCR is issued without an approved TCP, it will be approved by Ecology and EPA. Tank characterization information will be reported in a timely, usable, and accessible format for all users. The TCRs are intended to be living documents and must be updated as tank waste contents change due to addition or removal of waste and as new information becomes available.
- All data for each DST and SST will be placed in the administrative record and will be available in whole or part to users upon request.

<u>Milestone</u>	<u>Description</u>	<u>Due Date</u>
M-44-00	Issue Tank Characterization Reports (TCRs) based on process knowledge, prior characterization data, and validated empirical data acquired after May 1989 for 177 Hanford high level waste tanks. Provide offsite access to electronic database(s) containing tank characterization information through the Tank Characterization Database (TCD) and Hanford Environmental Information System (HEIS) through the Tank Waste Information Network System (TWINS) or approved analogues for 177 HLW tanks.	Sept. 19
	All issued TCRs will be updated quarterly as needed due to addition and/or removal of tank wastes and as new information is obtained.	

Validated data packages are to be placed in the administrative record.

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- 1991 RELEASE
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|---------|---|--|
| M-44-01 | Submit a draft copy of the TWRS Tank Waste Analysis Plan's (TWAP) and Tank Characterization Plans' (TCPs) revisions, updates, and additions annually to Ecology and EPA.  | May 1994<br>(and annually thereafter)  |
| M-44-02 | Submit TWAP and TCRs annually to Ecology and EPA for approval. The TWAP will cover safety, retrieval, pretreatment, and other processing needs. The TWAP will identify sampling and analysis activities projected for the following fiscal year. The TWAP will describe the TCPs to be issued for the year. The TCPs will cover sampling and analysis activities for each DST and SST to be characterized in the following fiscal year. The TWAP will also identify the following year's TCRs to be submitted and on what type of data they will be based. The TWAP will specify the contents of these TCRs. The TWAP and TCPs will be developed via a DQO process involving EPA, Ecology, and USDOE prior to implementation. If the three parties do not agree on any individual TCP then Ecology will issue a final decision by September 30 of that year for the scope of the plan. USDOE will implement the final decision. If USDOE disputes the final decision, the Ecology final decision will be implemented during the dispute resolution process. | Aug. 1994<br>(and annually thereafter) |
| M-44-03 | Submit three TCRs for initial evaluation and approval.  | Oct. 1993                              |
| M-44-04 | Complete input of characterization information for 3 HLW tanks to electronic database(s).   | Jan. 1994                              |
| M-44-05 | Issue 20 TCRs in accordance with the approved TCPs. If an approved TCP is not issued, the TCRs must be approved by Ecology and EPA.   | Sept. 1994                             |
| M-44-06 | Complete input of characterization information for 20 HLW tanks to electronic database(s).  | Sept. 1994                             |
| M-44-07 | Complete all FY 1992 and 1993 core sample analyses and complete validation of the resulting data.   | March 1994                             |
| M-44-08 | Issue 30 TCRs in accordance with the approved TCPs. Complete input of characterization information for 30 HLW tanks to electronic database(s).  | Sept. 1995                             |
| M-44-09 | Issue 40 TCRs in accordance with the approved TCPs. Complete input of characterization information for 40 HLW tanks to electronic database(s).  | Sept. 1996                             |
| M-44-10 | Issue 40 TCRs in accordance with the approved TCPs. Complete input of characterization information for 40 HLW tanks to electronic database(s).  | Sept. 1997                             |
| M-44-11 | Issue 30 TCRs in accordance with the approved TCPs. Complete input of characterization information for 30 HLW tanks to electronic database(s).  | Sept. 1998                             |

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M-44-12 Issue 14 TCRs in accordance with the approved TCPs. Complete input of characterization information for 14 HLW tanks to electronic database(s).

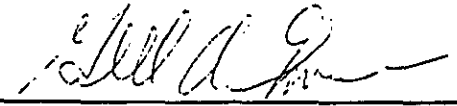
Sept. 1999

2001-05-14

IT IS SO AGREED:

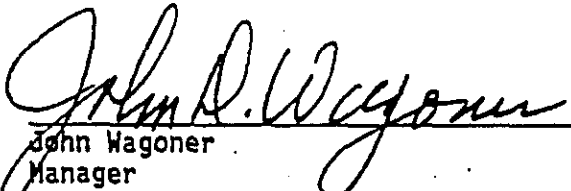
Each undersigned representative of a Party certifies that he or she is fully authorized to enter into this Agreement and Action Plan and to legally bind such Party to this Agreement and Action Plan. These change requests and amendments shall be effective upon the date on which this amendment agreement is signed by the Parties. Except as amended herein, the existing provisions of the Agreement shall remain in full force and effect.

FOR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY:

  
Gerald Emison  
Acting Regional Administrator  
Region 10  
U.S. Environmental Protection Agency


1-25-94  
Date

FOR THE UNITED STATES DEPARTMENT OF ENERGY:

  
John Wagoner  
Manager  
U.S. Department of Energy  
Richland Operations Office

1/25/94  
Date

FOR THE WASHINGTON STATE DEPARTMENT OF ECOLOGY:

  
Mary Riveland  
Director  
State of Washington  
Department of Ecology

1/25/94  
Date

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